

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
vs.) **Case No. 18-CR-135-CVE**
)
CARLA JO MIRES ALSO KNOWN AS)
DUNN,)
)
Defendant.)

**EX PARTE MOTION REQUIRING JUDGMENT DEBTOR
TO APPEAR AND ANSWER CONCERNING PROPERTY AND
ASSETS AND FOR INJUNCTION FORBIDDING
TRANSFER OR OTHER DISPOSITION OF PROPERTY**

The United States of America, by R. Trent Shores, United States Attorney, by Vani Singhal, Assistant United States Attorney, pursuant to 28 U.S.C. §3015, Fed.R.Civ.P. 69 and Okla. Stat. tit. 12, §842 requests that the Court enter an Order requiring the judgment debtor, CARLA JO MIRES ALSO KNOWN AS DUNN, to appear at a date certain and answer concerning property and assets, and for an injunction enjoining the judgment debtor from alienating, concealing or encumbering any non-exempt property. In support of this Motion, the United States shows the Court as follows:

1. United States is a judgment creditor, having obtained judgment in the above-entitled cause on December 11, 2014, against the above-named Defendant, CARLA JO MIRES ALSO KNOWN AS DUNN. A balance of \$166,861.89 remains outstanding.

2. Pending a hearing on assets, there is a danger that the judgment debtor will attempt to transfer, encumber, alienate, and/or conceal property in an attempt to place it beyond the reach

of creditors, and the United States submits that the Court should enter an order enjoining Defendant from so doing.

WHEREFORE, the United States requests as follows:

1. That the Court enter an order directing Defendant MIRES ALSO KNOWN AS DUNN to appear and answer concerning this property and assets on a day certain to be fixed by the Court.
2. That Defendant be further ordered to bring materials for the Court in order that a full and complete hearing on assets - specifically:
 - a. Copies of income tax returns, state and federal, for the past five tax years.
 - b. Records of any and all real property you own or which may be held in trust for you by anyone else including a legal description of the property.
 - c. A complete list of all personal property in which you have an interest, whether or not it is held in your name.
 - d. A complete list of all banks, savings and loan associations or any other place where you have money on deposit, stating the amounts being held.
 - e. Bank statements for the past 6 months.
 - f. All automobile titles.
 - g. Stocks, bonds and securities in which you have an interest, whether or not they are held in your name.
3. That the Court enter an order enjoining Defendant from transferring, alienating, concealing or encumbering any non-exempt property pending a hearing on assets and until further

order of this Court.

Respectfully submitted,

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U.S. ATTORNEY

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